

From: Wood, Dennis
Sent: Tuesday, July 16, 2002 11:20 AM
To: Evans, Merete; Scott, Betsy Sue
Subject: FW: Text Format Comment on 31 CFR Part 501

- ___Original Message-----

From: joyworks@directvinternet.com [mailto:joyworks@directvinternet.com]
Sent: Monday, July 15, 2002 3:54 PM
To: reg.comment@do.treas.gov
Subject: Text Format Comment on 31 CFR Part 501

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Regulation: 31 CFR Part 501.

Comments: As a consultant who works with companies establishing Export Compliance Internal Control Programs, I am strongly in favor of the proposed rule to share limited information regarding OFAC Civil Penalties.

One major barrier to compliance programs is helping employees believe the regulations apply in day to day job functions. Another is selling company executives on supporting compliance programs as part of their risk **reduction or** quality improvement policies. Specific cases make the regulations real, and the costs of violating them tangible. Raising awareness of the regulations by publicizing real life violations supports their visibility and effectiveness in the business world.

During acquisition negotiations, supplier qualifications and evaluations, and recruitment activities, compliance violation information is significant and should be reviewed so that the purchaser/employer is aware of problems they may be inheriting and the export history of the company or person involved. I have encouraged clients to use the Department of Commerce violation reports for these purposes and have seen only positive results from individual and company names being available. I would strongly encourage OFAC to include as many specifics as are available from violation actions that are completed, including names, and to provide this information as often as possible.